

CHAFFETZ LINDSEY LLP

1700 BROADWAY, 33RD FLOOR, NEW YORK, NY 10019
MAIN: +1 212 257 6960 | FAX: +1 212 257 6950

SCOTT REYNOLDS, PARTNER
DIRECT: +1 212 257 6925
S.REYNOLDS@CHAFFETZLINDSEY.COM

June 2, 2017

Hon. Valerie Caproni
Thurgood Marshall Courthouse
40 Foley Square, Room 430
New York, NY 10007
CaproniNYSDChambers@nysd.uscourts.gov

Re: *Domenica Nominees Pty. Ltd. et al. v. CGO V, LLC et al.*, 16-cv-09016-VEC

Dear Judge Caproni:

We represent Defendants in the above-referenced action. We write on their behalf and on behalf of Plaintiffs Domenica Nominees and Frank Wilson to update the Court on the parties' settlement efforts and to seek an additional - brief - extension of the existing deadlines in the case.

Plaintiffs Frank Wilson and Domenica have reached a settlement in principle with Defendants. A settlement agreement has been drafted and those parties are exchanging comments. Their counsel met in person yesterday in New York to continue working toward a final settlement agreement. We expect to complete that by the end of next week.

The parties therefore respectfully request a further one-week extension of all deadlines as follows:

- (1) Deadline for Defendants' reply in support of their motion to dismiss Plaintiffs' federal claims extended from June 5 to June 12;
- (2) Deadline for Defendants' opposition to Plaintiffs' preliminary injunction motion extended from June 5 to June 12;
- (3) Deadline for Plaintiffs' reply in support of that motion extended from June 19 to June 26; and
- (4) Discovery deadlines extended as follows:
 - a. Submission of a joint status letter from June 30 to July 7,
 - b. Completion of fact discovery from June 30 to July 7, and
 - c. Completion of expert discovery from August 30 to September 6.

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These deadlines have been extended twice for thirty days. The last extension was granted on April 21. (Dkt. No. 79).

Although no settlement in principle has been reached with Plaintiff Lucerne Australia Pty. Ltd., it, through its counsel, consents to this request.

We are, of course, happy to participate in a telephone status conference should the Court so desire.

Respectfully submitted,

//s/ Scott W. Reynolds

Scott W. Reynolds